3.600 St. Louis County

January 20, 1977

Mr. William Canney
West Lake Landfill, Inc.
Rt. 1, Box 206
Bridgeton, Missouri 63044



Dear Mr. Canney:

INTRODUCTION:

This is to follow up on the inspection of the West Lake Sanitary Landfill and West Lake Demolition Landfill made by a representative of the Missouri Department of Natural Resources on Friday, December 17, 1976. Representing the West Lake Landfill were Mr. William Canney, Mr. Earl Breadon, and Mr. Vernon Vehr. Representing the St. Louis County Health Department was Mr. Ray Snider. As a result of this inspection, the following unsatisfactory features were noted and recommendations for their correction are provided. I trust you will direct your attention to the recommendations contained in this report.

UNSATISFACTORY FEATURES:

1) It was observed that the demolition landfill area was receiving many materials, such as cardboard, that should not be disposed of in a demolition landfill.

COMMENTS AND RECOMMENDATIONS:

1) It is understood that many times, the people using the demolition landfill will have various non-demolition wastes mixed in with the demolition wastes, but it is felt that more care must be taken to eliminate disposal of these materials in the demolition site. The West Lake Landfill is reminded that a demolition landfill may only receive demolition wastes, construction wastes, brush, wood wastes, tires, inert plastics, soil, rock, concrete, and decomposable inert solids insoluable in water. All cardboard, paper, and other non-demolition wastes must be disposed of at the sanitary landfill site.

   It is recommended that steps be taken to ensure that non-demolition wastes are not disposed of in the demolition landfill. The person(s) responsible at the demolition and sanitary sites should be knowledgeable of what wastes can be disposed of at the demolition and sanitary sites. No hesitation should be made in sending a customer over to the sanitary site when it is discovered that this person has more than demolition wastes to be disposed of.

COMMENTS AND RECOMMENDATIONS:

2) At the time of the inspection, the landfill operation was located in the extreme southeast corner of the landfill site.

3) All trucks were dumping the solid wastes at the base of the working face while the landfill equipment spread and compacted the wastes up the working face. Cover material was being trucked in from another section of the landfill quarry operation and was being dumped above the working face. It is strongly recommended that the operating procedures previously mentioned be continued. These operating techniques will result in very good compaction and coverage of the solid wastes. Proper compaction will conserve landfill site capacity and minimize moisture infiltration and settlement.

4) Four of the six proposed groundwater monitoring wells had been constructed around the perimeter of the sanitary landfill. The four wells were located along the south and west sides of the landfill. Three of the wells are dry while the well located at the southeast corner of the landfill contained perhaps one to two-inches of water. It is recommended that regular inspections be made of these wells to determine any noticeable changes of the level of water in the wells.

5) It was observed that there still existed a portion of the sanitary landfill just northwest of the leachate observation well that had not been padded with the two foot compacted layer of impermeable clay. No solid waste had been placed on this area as of the time of the inspection. It is recommended that great care be taken when placing the rest of this pad adjacent to the existing pad to ensure that no openings or crevices result which would allow leachate to flow to the groundwater below. In theory, all leachate produced should accumulate on the impermeable clay pad and be collected at the completed leachate collection well located on the northeast corner of the sanitary landfill site.

6) Inspections in the past have revealed that the West Lake Sanitary Landfill had operated in at least one area outside the approved disposal area. The 12/17/76 inspection revealed that the sanitary landfill was operating within the approved disposal area limits. The West Lake Landfill is reminded that the sanitary landfill must operate within the approved sanitary landfill area limits set out in the approved engineering plans.

7) In response to your questions concerning effluent limitations, one copy of the Missouri Clean Water Commission Effluent Regulation has been enclosed. It is hoped that this Regulation will clear up any questions you have concerning effluent limitations.

If you have any questions, please feel free to give us a call at our St. Louis Office.

APPROVED:

Earl F. Holtgraeve, P.E.
Regional Administrator
St. Louis Regional Office
Department of Natural Resources

SUBMITTED BY:

Bud Stein
Environmental Engineer I
St. Louis Regional Office
Department of Natural Resources

EFH/BS/ju

CC: Central Office, SW Program
Ray Snider, St. Louis County Health Dept.

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY

# SANITARY LANDFILL SURVEILLANCE RECORD

Date: 12-17-76

Name of Sanitary Landfill: West Lake Landfill, Inc [Sanitary & Demolition]

Permit No: 118903 County: St. Louis

Owner: West Lake Landfill, Inc Operator: Same as Owner

Address: Rt. 1, Box 206 Address:

St. Louis, MO 63042

I. Special Conditions and Approved Modifications

A. Are there any special conditions or approved modifications of the satisfactory compliance subsections of the rules and regulations? (e.g. impermeable barrier, limited excavation, exceptions to daily cover requirements)

✓ Yes _____ No

B. Is the sanitary landfill operation in compliance with the special conditions or approved modifications? (If "No", describe violations under "REMARKS".)

✓ Yes _____ No

II. Check Types of Waste Accepted

| | INDICATED ON PERMIT APPLICATION | REPORTED BY OPERATOR | AS OBSERVED |
|---|---|---|---|
| Municipal solid waste (Sanitary Landfill) | ✓ | | ✓ |
| Bulky waste | | | |
| Dead animals | | | |
| Incinerator residue | | | |
| Demolition and construction waste (2 Demolition) | ✓ | | ✓ |
| Brush and untreated wood waste (3 Landfill) | ✓ | | ✓ |
| Septic tank pumpings | | | |
| Wastewater treatment plant sludges | | | |
| OTHER SLUDGES (SPECIFY) | | | |
| LIQUIDS (SPECIFY) | | | |
| INDUSTRIAL PROCESS WASTE (SPECIFY) | | | |
| HAZARDOUS WASTES (SPECIFY) | | | |
| OTHER WASTES (SPECIFY) | | | |

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III. Satisfactory Compliance Subsections

Check all sections: SAT – Satisfactory; UNS – Unsatisfactory. (If necessary, describe "UNS" violations under "Remarks".)

| SUBSECTION NUMBER | SATISFACTORY COMPLIANCE OPERATING PROCEDURE | SAT | UNS |
|---|---|---|---|
| **2.1.0 SOLID WASTE ACCEPTED** | | | |
| 2.1.3.A | Routine sanitary landfill techniques of spreading and compacting solid waste and placing cover material daily. | ✓ | |
| 2.1.3.B | Bulky solid waste crushed on solid ground and pushed onto working face near bottom of the cell. | ✓ | |
| 2.1.3.C | Small dead animals covered immediately with soil or solid waste. Large dead animals placed in pit and covered with four feet compacted soil. | ✓ | |
| 2.1.3.D | Disposal of dewatered sludges on working face along with municipal solid waste. | ✓ | |
| 2.1.3.E | Incinerator and air pollution control residues prevented from becoming airborne. | ✓ | |
| **2.2.0 SOLID WASTE EXCLUDED** | | | |
| 2.2.3.A | No unpermitted waste accepted. (Demolition) | | ✓ |
| 2.2.3.B | Sign posted at entrance listing excluded wastes. | ✓ | |
| **2.3.0 SITE SELECTION** | | | |
| 2.3.3.A | Site accessible in all weather conditions. Temporary roads provided for delivery to working face. | ✓ | |
| 2.3.3.B | Public roads or access roads to the site above flood elevation. | ✓ | |
| **2.5.0 WATER QUALITY** | | | |
| 2.5.3.A | Surface water courses and runoff properly diverted from the landfill. Sanitary landfill construction and grading to promote rapid surface water runoff without excessive erosion. | ✓ | |
| 2.5.3.B | Leachate collection and treatment systems utilized where necessary to protect ground and surface water resources. | ✓ | |
| 2.5.3.C | No groundwater in contact with solid waste. | ✓ | |
| **2.6.0 AIR QUALITY** | | | |
| 2.6.3 | No open burning without written permission of the proper air pollution agency and the Division. | ✓ | |
| **2.7.0 GAS CONTROL** | | | |
| 2.7.3.A | Decomposition gases adequately vented to prevent danger to occupants of adjacent property. | ✓ | |
| 2.7.3.B | Decomposition gases vented in a manner to prohibit accumulation in explosive or toxic concentrations. | ✓ | |
| **2.8.0 VECTORS** | | | |
| 2.8.3 | Vector control programs implemented when necessary to prevent or rectify vector problems. | ✓ | |
| **2.9.0 AESTHETICS** | | | |
| 2.9.3.A | Litter control devices utilized near working face and elsewhere as needed. Litter collected from fences, and the ground surface, and incorporated into the daily cell at the end of each day or containerized. | ✓ | |
| 2.9.3.B | Wastes easily moved by wind covered as necessary to prevent their becoming airborne and scattered. | ✓ | |

| SUBSECTION NUMBER | SATISFACTORY COMPLIANCE OPERATING PROCEDURE | SAT | UNS |
|---|---|---|---|
| **2.9.0 AESTHETICS (continued)** | | | |
| 2.9.3.C | On-site vegetation and natural windbreaks being utilized to improve appearance and operation of the sanitary landfill. | ✓ | |
| 2.9.3.D | Salvaged materials removed daily or stored in aesthetically acceptable containers or enclosures. | ✓ | |
| **2.10.0 COVER MATERIAL** | | | |
| 2.10.3.A | Daily cover applied regardless of weather in not less than a six inch layer. Cover material available in all weather conditions. | ✓ | |
| 2.10.3.B | Intermediate cover applied to all areas idle for more than 60 days in a layer not less than one foot after compaction. | ✓ | |
| 2.10.3.C | Final cover applied on each area as completed in a layer not less than two feet after compaction. | ✓ | |
| **2.11.0 COMPACTION** | | | |
| 2.11.3.A | Working face not flatter than 3:1. | ✓ | |
| 2.11.3.A1 | Solid waste spread in layers not to exceed two feet and confined to smallest practical area. | ✓ | |
| 2.11.3.A2 | Wastes compacted to smallest practical volume. | ✓ | |
| 2.11.3.A3 | Cover material compacted as much as practical. | ✓ | |
| 2.11.3.B | Preventive maintenance performed. | ✓ | |
| 2.11.3.C | Daily task operating manual provided. | ✓ | |
| **2.12.0 SAFETY** | | | |
| 2.12.3.A | Fire extinguishers provided on all equipment. | — | |
| 2.12.3.B | Provisions for extinguishing fires in waste, equipment and structures. | — | |
| 2.12.3.C | Communication equipment available. | ✓ | |
| 2.12.3.D | Scavenging prohibited | ✓ | |
| 2.12.3.E | Controlled access to site by established roadways and limited to hours when operating personnel are on duty. | ✓ | |
| 2.12.3.F | Traffic controlled and directed to appropriate disposing points. | ✓ | |
| 2.12.3.G | Dust controlled for safety purposes and to prevent nuisances. | ✓ | |
| **2.13.0 RECORDS** | | | |
| 2.13.3.A1 | Records of major problems and complaints. | — | |
| 2.13.3.A2 | Monitoring record maintained.<br>a. leachate sampling and analyses,<br>b. gas sampling and analyses,<br>c. ground and surface water analyses. | ✓ | |
| 2.13.3.A3 | Records of vector control efforts. | ✓ | |
| 2.13.3.A4 | Records of dust and litter control efforts. | ✓ | |
| 2.13.3.A5 | Records of quantity of waste handled. | ✓ | |
| 2.13.3.A6 | Records of description, sources, and volume of special wastes listed in Subsection 2.2.1. | ✓ | |

IV. Operation Proceeding in Accordance With Approved Engineering Plans? (If "No", describe violations under "Remarks".)

✓ Yes _____ No

REMARKS The demolition site had accepted some paper and cardboard. There was also at least two barrels of a semi-solid material that smelled like glue. It appeared that most of those materials were mixed in with demolition wastes when brought in

(Attach additional sheets as necessary.)

BY Bud Stan
SIGNATURE OF INVESTIGATOR